

Exhibit II

**Email from Neil Ende to Rochelle Sparko
August 4, 2025**

Greg Taylor**Wednesday, August 27, 2025 at 8:40:48 PM Central Daylight Time**

Subject: Re: [AZ v. Avid Telecom] RE: Documents Received by AGs In Response to Subpoenas to Financial Institutions

Date: Monday, August 4, 2025 at 6:51:58 PM Central Daylight Time

From: Neil Ende <nende@tlgdc.com>

To: Sparko Rochelle <rsparko@ncdoj.gov>

CC: Nayer Tracy <Tnayer@ncdoj.gov>, Martindale Thomas L <Thomas.Martindale@atg.in.gov>, Swetnam Douglas <douglas.swetnam@atg.in.gov>, Singer Nelson Michel <michel.singernelson@coag.gov>, Dilweg Laura <Laura.Dilweg@azag.gov>, Pelton Sarah <Sarah.Pelton@azag.gov>, Leahy Erin <erin.leahy@ohioago.gov>, Meislak Alyse <Alyse.Meislak@azag.gov>, Jones Dylan <Dylan.Jones@azag.gov>, Trombley Nikki <Nikki.Trombley@azag.gov>, Dillon IV John <John.DillonIV@azag.gov>, Greg Taylor <gtaylor@tlgdc.com>

Attachments: image001.png, image002.png, image003.png, image004.png, image005.png, image006.png

Rochelle:

Good evening!

Again, you have ignored our request to meet and confer on the issues set forth in our last meet and confer letter. The issues in that letter include the AGs refusal to designate any 30B6 witnesses.

Your refusal to engage in the meet and confer process is clearly willful. It is our intention to bring your conduct to the attention of the court and to seek authorization to file a motion to compel and for appropriate sanctions.

Also, just a reminder that we need also dates of availability to meet and confer on defendants' Motion to Revise as ordered by the court today.

Thank you.

Neil S. Ende
Managing Partner
Technology Law Group
202.256.0120
TLG Conference Bridge:
703.229.6741, PIN: 854#

Sent from my iPhone

On Aug 4, 2025, at 1:05 PM, Neil Ende <nende@tlgdc.com> wrote:

AGs:

We write *again, inter alia*, pursuant to FRCP Rule 45, to ask when you intend to: (i) produce documents that you received in response to the subpoenas that you issued to various financial institutions seeking records about Mr. Lansky (that are not part of any RFP from Defendants); (ii) respond to the detailed Meet and Confer letter that we sent the other week.

We ask, again, that you respond *directly and with specificity* with date(s) when each response can be expected by the close of business today.

Thank you!

Neil S. Ende, Esq.
Managing Partner
Technology Law Group, LLC
nende@tlgdc.com
202-895-1707 (Office)
202-256-0120 (Mobile)
703-229-6741 PIN 854# (Voice Conference Bridge)

From: Sparko, Rochelle <rsparko@NCDOJ.GOV>
Date: Tuesday, July 29, 2025 at 2:25 PM
To: Neil Ende <nende@tlgdc.com>, Greg Taylor <gtaylor@tlgdc.com>
Cc: Nayer, Tracy <Tnayer@ncdoj.gov>, Martindale Thomas L <Thomas.Martindale@atg.in.gov>, Swetnam Douglas <douglas.swetnam@atg.in.gov>, Singer Nelson Michel <michel.singernelson@coag.gov>, Dilweg, Laura <Laura.Dilweg@azag.gov>, Pelton, Sarah <Sarah.Pelton@azag.gov>, Erin Leahy <erin.leahy@OhioAGO.gov>, Meislik, Alyse <Alyse.Meislik@azag.gov>, Jones, Dylan <Dylan.Jones@azag.gov>, Trombley, Nikki <Nikki.Trombley@azag.gov>, Dillon IV, John <John.DillonIV@azag.gov>
Subject: [AZ v. Avid Telecom] RE: Documents Received by AGs In Response to Subpoenas to Financial Institutions

Good afternoon, Neil,

Plaintiffs are preparing a supplemental response to Defendants' First Request for Production of Documents pursuant to F.R.C.P 26(e)(1)(A) and will produce it to you when it is complete.

Regards,

Rochelle Sparko
Special Deputy Attorney General
Consumer Protection Division
North Carolina Department of Justice
(919) 716-6811
rsparko@ncdoj.gov
Post Office Box 629, Raleigh, NC 27602
114 West Edenton Street, Raleigh, NC 27603
<https://ncdoj.gov/>
Please note messages to or from this address may be public records.

From: Neil Ende <nende@tlgdc.com>
Sent: Tuesday, July 22, 2025 11:01 AM
To: Erin Leahy <erin.leahy@OhioAGO.gov>
Cc: Nayer, Tracy <Tnayer@ncdoj.gov>; Martindale Thomas L <Thomas.Martindale@atg.in.gov>; Swetnam Douglas <douglas.swetnam@atg.in.gov>; Singer Nelson Michel

<michel.singernelson@coag.gov>; Sparko, Rochelle <rsparko@NCDOJ.GOV>; Dilweg, Laura <Laura.Dilweg@azag.gov>; Pelton, Sarah <Sarah.Pelton@azag.gov>; Meislik, Alyse <Alyse.Meislik@azag.gov>; Jones, Dylan <Dylan.Jones@azag.gov>; Trombley, Nikki <Nikki.Trombley@azag.gov>; Dillon IV, John <John.DillonIV@azag.gov>; Greg Taylor <gtaylor@tlgdc.com>

Subject: Documents Received by AGs In Response to Subpoenas to Financial Institutions

Importance: High

Erin:

Good morning.

To my knowledge, we have not received copies of any of the documents received by the AGs in response to the numerous subpoenas issued to financial institutions that the AGs apparently believe have some relationship to Mr. Lansky or Avid Telecom.

Please advise which institutions you have received documents from and please provide those documents to us no later than the end of this week. See, e.g., FRCP Rule 26(e).

Please confirm that you will continue to provide all documents received from these institutions, and any other third parties to which subpoenas are hereafter issued without the need for a request.

Thank you.

Neil S. Ende, Esq.
Managing Partner
Technology Law Group, LLC
nende@tlgdc.com
202-895-1707 (Office)
202-256-0120 (Mobile)
703-229-6741 PIN 854# (Voice Conference Bridge)

From: Erin Leahy <erin.leahy@OhioAGO.gov>

Date: Monday, July 21, 2025 at 4:22 PM

To: Greg Taylor <gtaylor@tlgdc.com>, Neil Ende <nende@tlgdc.com>

Cc: Tracy Nayer <Tnayer@ncdoj.gov>, Martindale Thomas L

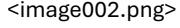
<Thomas.Martindale@atg.in.gov>, Swetnam Douglas <douglas.swetnam@atg.in.gov>, Singer Nelson Michel <michel.singernelson@coag.gov>, Sparko Rochelle <rsparko@ncdoj.gov>, Dilweg, Laura <Laura.Dilweg@azag.gov>, Pelton, Sarah <Sarah.Pelton@azag.gov>, Meislik, Alyse <Alyse.Meislik@azag.gov>, Jones, Dylan <Dylan.Jones@azag.gov>, Trombley, Nikki <Nikki.Trombley@azag.gov>, Dillon IV, John <John.DillonIV@azag.gov>

Subject: RE: [AZ v. Avid Telecom] meet and confer (as sent)

Greg,

Your email has been received. As indicated in our written responses, now that both the

protective order the ESI order have been entered, Plaintiffs will be producing additional documents. You should receive Volume 002 via a link from Everlaw tomorrow and Volume 003 via a hard drive delivered by courier this week to the address provided by Neil. We will review your meet and confer letter and respond as appropriate within a reasonable amount of time.

 Erin B. Leahy
Senior Assistant Attorney General
Consumer Protection Section
Office of Ohio Attorney General Dave Yost
30 East Broad St., 14th Floor
Columbus, Ohio 43215

Office number: 614-752-4730
Erin.Leahy@OhioAGO.gov

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From: Greg Taylor <gtaylor@tlgdc.com>
Sent: Thursday, July 17, 2025 6:45 PM
To: Erin Leahy <erin.leahy@OhioAGO.gov>
Cc: Tracy Nayer <Tnayer@ncdoj.gov>; Martindale Thomas L <Thomas.Martindale@atg.in.gov>; Swetnam Douglas <douglas.swetnam@atg.in.gov>; Singer Nelson Michel <michel.singernelson@coag.gov>; Sparko Rochelle <rsparko@ncdoj.gov>; Dilweg, Laura <Laura.Dilweg@azag.gov>; Pelton, Sarah <Sarah.Pelton@azag.gov>; Meislik, Alyse <Alyse.Meislik@azag.gov>; Jones, Dylan <Dylan.Jones@azag.gov>; Trombley, Nikki <Nikki.Trombley@azag.gov>; Neil Ende <nende@tlgdc.com>; Dillon IV, John <John.DillonIV@azag.gov>
Subject: [AZ v. Avid Telecom] meet and confer (as sent)

Erin:

As promised, attached is Defendants' written meet and confer issues to resolve. We ask that you respond in kind no later than Thursday, July 24th.

Kindly confirm receipt.

Best,

Greg Taylor, of Counsel
Technology Law Group, LLC

80 E. Fifth St. | Second Floor | Edmond, OK 73034

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